



## GUIDANCE REGARDING GRADUATION FEES FOR STUDENTS IN TRANSITORY HOUSING

**PURPOSE:** This document provides guidance to LEAs regarding the elimination of barriers to homeless children and youth's participation in graduation activities.

**OVERVIEW:** Approximately **one in every 24 students** attending District of Columbia Public and Public Charter Schools has been identified as homeless. The term "homeless" refers to children and youth who lack a fixed, regular, and adequate nighttime residence. Homelessness results from a complex set of circumstances. These circumstances require families to choose between food, shelter, and other basic needs. Homelessness can be the result of lack of affordable housing, divorce, domestic violence, illness/injury, job loss/insufficient wages, lack of child support, and/or natural disaster (fires, floods, tornados).

Local education agencies are required to undertake steps to review policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and youth (Subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.)).

**UNIQUE BARRIERS FACED BY GRADUATING HOMELESS STUDENTS:** The high mobility, trauma, and poverty associated with homelessness create unique educational barriers and challenges that may prevent homeless students from participating in graduation activities when there are associated fees. The Office of the State Superintendent of Education strongly encourages you to ensure that homeless students are not prevented from participating in these activities because they cannot pay these fees. Timelines, graduation fees, required parental signatures; bundled graduation costs, transportation costs and other local policies should be closely reviewed and revised to eliminate any negative impact on homeless students' ability to participate in graduation.

### WHAT CAN LEAS DO?

- Revise Policies that Act as Barriers: LEAs and their local liaisons should work to revise policies that prevent these students from participating in graduation programs. These may include deadlines that unintentionally become barriers for homeless students whose mobility may prevent them from complying. Requiring parent signatures may also create an unintentional barrier.
- Waive Fees: LEAs may opt to waive late fees or eliminate all fees associated with graduation for students experiencing homelessness.
- Seek Local Support: LEAs can explore non-federal funding options in the form of private donations, or local funds that can pay for or subsidize graduation fees. In general, fees that act as barriers to full participation of homeless students in school should be waived or paid for with donations or local funds (42 U.S.C. §§ 11432(g)(1)(I))(g)(7)).
- Unbundle Graduation Costs: LEAs may increase access to graduation costs by unbundling costs. LEAs often bundle the cost of class rings or pins, invitations, pictures, graduation robes, entertainment etc. and require students to pay a single bundled fee for all of these graduation related costs. This means that federal funds may not be used

to cover the cost because several unallowable costs are included in the bundled fee. If itemized cost detail is provided, students have greater flexibility to participate by purchasing only those items required to participate in graduation. In addition, Title I, Part A funds can be used to purchase graduation robes if the LEA requires students to wear a robe to participate in graduation activities or if graduation robes are not required but virtually all students wear them. By contrast, Title I, Part A funds cannot be used to purchase class rings or to pay for entertainment because these items are not necessary to take advantage of education opportunities nor do they assist a child in meeting the District of Columbia's academic achievement standards.

**What Resources are Available?** In LEAs with McKinney-Vento subgrants, the Title I coordinator and local liaison should discuss the most effective way to leverage resources. In LEAs without McKinney-Vento subgrants, the Title I, Part A program will likely be an essential resource for providing services for homeless students. Program specific guidance is provided below.

- **Title I, Part A Funding-** A child who is homeless and is enrolled at an LEA is eligible for Title I, Part A services. Specifically, an LEA has the discretion to use funds to provide a homeless student with services that are not ordinarily provided to other Title I students and that are not available from other sources. This means that an LEA, at its discretion, may use Title I, Part A funds to provide a student with clothing required in order to take part in graduation exercises (see unbundled costs in preceding section).
- **Title X, Part C** (McKinney-Vento Homeless Assistance Program) - LEAs with awards under this federal program can use McKinney-Vento funds to assist homeless children and youth in enrolling, attending, and succeeding in school in accordance with their approved application/plan.

#### **Where Can I Get More Information Regarding the McKinney Vento Homeless Assistance Program**

- **OSSE Transitory Services Website:** The Transitory Services team in the Office of the State Superintendent of Education works with Local Education Agencies and other stakeholders to eliminate barriers to homeless students' enrollment, retention and success in school. For more information and for resources to assist you in helping homeless students succeed in school, please visit the Transitory Services webpage in the Elementary and Secondary Division section of [OSSE.dc.gov](https://osse.dc.gov).

#### **OSSE Transitory Services Program Contacts:**

| NAME               | TITLE                      | PHONE NUMBER   | EMAIL  |
|--------------------|----------------------------|----------------|--|
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